

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI  
NORTHERN DIVISION

LATOYA BROWN; LAWRENCE  
BLACKMON; HERBERT ANTHONY  
GREEN; KHADAFY MANNING;  
QUINNETTA MANNING; MARVIN  
MCFIELD; NICHOLAS SINGLETON;  
STEVEN SMITH; BESSIE THOMAS; and  
BETTY JEAN WILLIAMS TUCKER,  
individually and on behalf of a class of all  
others similarly situated,

Plaintiffs,

v.

MADISON COUNTY, MISSISSIPPI;  
SHERIFF RANDALL S. TUCKER, in his  
official capacity; and MADISON COUNTY  
SHERIFF'S DEPUTIES JOHN DOES #1  
through #6, in their individual capacities,

Defendants.

Civil Action No.  
3:17-cv-00347-WHB-LRA

**STIPULATED SCHEDULING ORDER**

Plaintiffs and Defendants hereby stipulate and agree that, subject to the approval of the Court, the following schedule shall apply in this case:

1. The deadline for submission of any expert reports and/or declarations in support of Plaintiffs' motion for class certification, and Plaintiffs' related disclosures, is **March 14, 2018**.
2. Discovery of any expert who submits a report and/or declaration in support of Plaintiffs' motion for class certification shall commence on **March 14, 2018**. Plaintiffs shall make any such expert(s) available to be deposed where the experts may be found on a date no later than twenty-five (25) days following the experts' disclosure, except where the Parties agree to conduct

such deposition(s) at a later date within this expert discovery period. Plaintiffs will endeavor in good faith to offer their expert(s) for deposition on an early date or dates in the 25-day period following disclosure, to the extent reasonably practicable.

3. The deadline for submission of (i) Defendants' brief in opposition to Plaintiffs' motion for class certification and (ii) any expert reports and/or declarations in opposition to Plaintiffs' motion for class certification, and Defendants' related disclosures, will be **May 8, 2018**.

4. Discovery of any expert who submits a report and/or declaration in support of Defendants' brief in opposition to Plaintiffs' motion for class certification shall commence when Defendants submit such brief and conclude on **July 2, 2018**. Defendants shall make any such experts available to be deposed where the experts may be found on a date no later than on a date no later than twenty-five (25) days following the experts' disclosure, except where the Parties agree to conduct such deposition(s) at a later date within this expert discovery period. Defendants will endeavor in good faith to offer their expert(s) for deposition on an early date or dates in the 25-day period following disclosure, to the extent reasonably practicable.

5. The Parties will assume the respective costs associated with their own experts' time spent preparing for those depositions. The Parties deposing the opposite Party's experts will be responsible for the opposite Party's experts' time spent in those depositions.

6. The deadline for submission of (i) Plaintiffs' reply brief in further support of Plaintiffs' motion for class certification and (ii) any rebuttal expert reports and/or declarations on behalf of Plaintiffs, and related disclosures, will be **July 2, 2018**.

Dated: February 26, 2018

By: /s/ Joshua Tom  
Joshua Tom

AMERICAN CIVIL LIBERTIES UNION  
OF MISSISSIPPI FOUNDATION  
Joshua Tom (MSB #105392)  
233 East Capitol Street  
Jackson, MS 39201  
(601) 354-3408  
JTom@aclu-ms.org

AMERICAN CIVIL LIBERTIES UNION  
FOUNDATION  
Ezekiel Edwards (*pro hac vice*)  
Jeffery Robinson (*pro hac vice* forthcoming)  
125 Broad Street  
New York, NY 10004  
(212) 549-2610  
eedwards@aclu.org  
jrobinson@aclu.org

SIMPSON THACHER & BARTLETT LLP  
Jonathan K. Youngwood (*pro hac vice*)  
Janet A. Gochman (*pro hac vice*)  
Isaac Rethy (*pro hac vice*)  
Kavitha S. Sivashanker (*pro hac vice*)  
Nihara K. Choudhri (*pro hac vice*)  
Christopher Shields (*pro hac vice*)  
Brooke Jarrett (*pro hac vice*)  
Christopher Jumin Lee (*pro hac vice*)  
425 Lexington Avenue  
New York, NY 10017  
(212) 455-2000  
jyoungwood@stblaw.com  
jgochman@stblaw.com  
irethy@stblaw.com  
kavitha.sivashanker@stblaw.com  
nchoudhri@stblaw.com  
christopher.shields@stblaw.com  
bonnie.jarrett@stblaw.com  
christopherjumin.lee@stblaw.com

*Attorneys for Plaintiffs*

By: /s/ Charles E. Ross  
Charles E. Ross

WISE CARTER CHILD & CARAWAY, P.A.  
Michael B. Wallace (MSB #6904)  
Charles E. Ross (MSB #5683)  
James E. Graves (MSB #102252)  
Charles E. Cowan (MSB #104478)  
Post Office Box 651  
Jackson, Mississippi 39205-0651  
Telephone: 601-968-5534  
Facsimile: 601- 944-7738  
mbw@wisecarter.com  
cer@wisecarter.com  
jeg@wisecarter.com  
cec@wisecarter.com

and

WISE CARTER CHILD & CARAWAY, P.A.  
T. Russell Nobile (MSB #100682)  
2510 14th Street, Suite 1125  
Gulfport, Mississippi 39501  
Telephone: 228-867-7141  
Facsimile: 228-867-7142  
trn@wisecarter.com  
OF COUNSEL:

CURRIE JOHNSON & MYERS, P.A.  
Rebecca B. Cowan (MSB #7735)  
1044 River Oaks Dr.  
Jackson, MS 39232  
P.O. Box 750  
Jackson, Mississippi 39205-0750  
Telephone: 601-969-1010  
Facsimile: 601-969-5120  
bcowan@curriejohnson.com

KATIE BRYANT SNELL, PLLC  
Katie Bryant Snell (MSB #103607)  
P.O. Box 3007  
Madison, Mississippi 39130-3007  
Telephone: 601-460-9800

katie@katiebryantsnell.com

PETTIS, BARFIELD & HESTER, P.A.  
J. Lawson Hester (MSB #2394)  
4450 Old Canton Road, Suite 210  
Jackson, Mississippi 39211  
Telephone: (601) 987-5300  
Facsimile: (601) 987-5353  
lhester@pbhfirm.com

*Attorneys for Defendants*

The foregoing Stipulated Scheduling Order is approved and adopted as an Order of the Court in the United States District Court for the Southern District of Mississippi, Northern Division, this 27<sup>th</sup> day of February, 2018.

  
LINDA R. ANDERSON  
UNITED STATES MAGISTRATE JUDGE